

Addtnl. Information

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SP-14836

**From:** Mackeprang, Matthias [MMackeprang@leschaco.com]

**Sent:** Monday, April 13, 2009 6:11 PM

**To:** Special Permits <PHMSA>

**Subject:** Request for Special Permission for Emergency processing (49 CFR 107.101 and 49 CFR 107.117)

**Attachments:** TCAC-PANDA.pdf; H14912 DRUMS 006.jpg; H14912 DRUMS 007.jpg; H14912 DRUMS 002.jpg; H14912 DRUMS 005.jpg; YANCHENG\_multimodal\_dangerous\_goods\_form\_1 (2)CHANGED.doc; FRPT585058.PDF; LESCHACO request for special permit.pdf

Dear Sirs,

Leschaco, Inc. hereby requests a special permit be issued so that the packaging requirements 49 CFR 173.227 for 20 drums (6HA1) packed under the packing instruction P001 for UN2442 for one transport from Houston, TX to Orange TX, be waived, thus allowing Leschaco, Inc. to transport the goods in question (please see attached LESCHACO request for special permit).

**Cargo status**

20 x 6HA1 drums, 5470 Kg gross on 5 pallets in warehouse Southwest Freight Houston (see pictures)

Drums are marked:

UN6HA1/Y1 8/10U/08 & CH/321336P1 012  
OR CH/321338P1 012

**Location**

Southwest Freight Houston  
9005 Spikewood Drive  
Houston TX, 77078

**Destination**

Solvay Solexis, Inc.  
4059 FM Road 1006 Orange, TX, 77630

**Classification**

49 CFR classifies it as:

UN2442 Trichloroacetyl Chloride, 8, (6.1) II, Toxic Inhalation Hazard Zone B (see 49 CFR 172.101 Hazardous Materials Table, column (6) and (7))

IMDG Classification: UN2442 Trichloroacetyl Chloride, 8, II

DEPT OF TRANSPORTATION  
POSTED  
APR 14 2009  
10 06 AM '09

## Packaging requirements

49 CFR requires that UN2442 is packed as per 49 CFR 173.227 (see entry in 49 CFR HMT) in an X-rated packaging for packing group I and further packed in 1A2 or 1H2 drums.

IMDG requirement P001 packing group II, single packaging allowed

## Actual Difference to the requirements of the 49 CFR

- Packaging performance y-rated instead x-rated
- Single packaging and not further packaged in 1A2 or 1H2 as required by 173.227

## Request of special permit

Leschaco, Inc. hereby requests a special permit be issued so that the packaging requirements 49 CFR 173.227 for 20 drums (6HA1) packed under the packing instruction P001 for UN2442 for one transport from Houston, TX to Orange TX, be waived, thus allowing Leschaco, Inc. to transport the goods in question.

- Request of the further use of the 6HA1 y-rated drums without transloading into x-rated drums
- Request of transport of these single drums further packed into 1A2 or 1H2 drums as per 173.227 and blocked and braced in a dedicated, sealed truck from Southwest Freight without any intermediate stop as per 173.227 (c).
- Request of organizing the transport as freight forwarding agency

## Reason for the request

The product is not packed as required by 49 CFR. This is a potential safety issue for the workers of the warehouse Southwest Freight, Houston.

Decanting the product from the current 6HA1 y-rated packagings into the required 6HA1 x-rated packagings would be a safety risk. There is a possibility that personnel are exposed to the fumes of this product at the time of the decanting process. The 20 6HA1 y-rated drums are fulfilling the requirements of the IMDG and did not suffer any outside damages while transported from China to their current location.

Further packaging these drums into 1H2 or 1A2 drums as per 49 CFR 173.227 instead of decanting would diminish the possibility and risk by exposure to fumes.

## Precaution, Preparation of the cargo for transport

- The cargo will be inspected and markings and labeling will be corrected as per requirements of 49 CFR
- Further packaging into 1A2 or 1H2 drums
- The delivery order will be issued on behalf of the attached Hazardous goods Declaration with following attachments
  - Hazardous goods declaration
  - MSDS from the manufacturer (TCAC-PANDA.pdf)
  - Special instructions + contact numbers for immediate response
- The driver will be specifically briefed about the sensitivity of the cargo and the immediate response requirements
- The transport will be organized during the daytime avoiding high population areas and the delivery time will be coordinated with the consignee, to avoid unnecessary waiting times
  - The distance from Houston to the consignee in Orange TX is 109 miles (3-4 hours transit time)

Sincerely Yours

Best regards

**Matthias Mackeprang**  
**Hazmat Manager**

**Leschaco, Inc.**

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Houston, TX 77032  
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internet: [www.leschaco.com](http://www.leschaco.com)



***CERTIFIED***

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<http://www.anker-leschaco.com/ctpat>

**PERFECT LOGISTICS, INC.**  
 370 AMAPOLA AVE. SUITE# 207, TORRANCE, CA 90501  
 TEL: 310-328-1988 FAX: 310-328-1198 EMAIL: OPERATION@PERFECTLOGISTICS.NET  
**LOAD # 11947 FDESTINATION ETA 3/20**

SHIPPER <b>YANCHENG JIANGWEI</b>	REFERENCE NO. <b>OI-0902177</b>	DATE <b>3/17/09 3:07 PM</b>
	MASTER B/L NO. <b>MAEU590136418</b>	PREPARED BY <b>KATHERINE</b>
CONSIGNEE <b>SOLVAY SOLEXIS INC 4059 FM ROAD 1006 ORANGE, TX 77630 UNITED STATES OF AMERICA</b>	SUB B/L NO.	HOUSE B/L NO. <b>HSHC09020035</b>
	AMS B/L No. <b>DEWCSD904617</b>	CUSTOMER REF. NO.
NOTIFY PARTY <b>SOLVAY SOLEXIS INC 4059 FM ROAD 1006 ORANGE, TX 77630 UNITED STATES OF AMERICA</b>	VESSEL & VOY NO. <b>CMA CGM FORCE 089E</b>	
	PORT OF LOADING <b>SHANG HAI, SHANGHAI, CHINA</b>	ETD <b>02/17/09</b>
	PORT OF DISCHARGE <b>LOS ANGELES, CA</b>	ETA <b>03/01/09</b>
	PLACE OF DELIVERY <b>LOS ANGELES, CA</b>	
BROKER <b>LESCHACO 8552 KATY HWY HOUSTON, TX 77024 ATTN : EMMA GREENE TEL:281-590-2533 FAX:281-590-5039</b>	FINAL DESTINATION <b>HOUSTON, TX</b>	ETA <b>03/20/09</b>
	FREIGHT LOCATION <b>SOUTHWEST FREIGHT/ HOUSTON TEL:713-631-1800</b>	FIRM CODE <b>S806</b>
DEVAN LOCATON <b>IMPERIAL CFS WHSE. Z165 TEL:310-768-8188</b>		AVAILABLE DATE
LAST FREE DATE		G.O. DATE

I.T. NO :	<b>605 138 634</b>	DATE : <b>03/01/09</b>	PLACE : <b>LOS ANGELES, CA</b>
PARTICULARS FURNISHED BY SHIPPER			
CONTAINER NO./SEAL NO. MARKS & NOS.	NO. OF CONT. NO. OF PKGS.	DESCRIPTION OF PACKAGES AND GOODS	GROSS WEIGHT MEASUREMENT
	<b>20 DRUMS</b>	<b>TRICHLOROACETYL CHLORIDE</b>	<b>5470.00 KGS 12059.16 LBS</b>
			<b>6.700 CBM 237 CFT</b>

\* Container No.  
POCU0458417 / 20' / 0171689

"O B/L RECEIVED"  
CFS/CFS

REMARK:

- TO ALL CUSTOMERS:
- PLEASE SEND MONEY ORDER, CASHIER'S CHECK OR ACH TRANSFER PAYABLE TO "PERFECT LOGISTICS, INC." ONLY BROKERS' CHECKS WILL BE ACCEPTED.
  - FREIGHT RELEASE ONLY UPON RECEIPT OF CHARGES SHOWN BELOW AND PROPERLY ENDORSED ORIGINAL HOUSE BILL OF LADING.
  - PRIOR TO CARGO PICK-UP, CONSIGNEE MUST CLEAR CUSTOMS AND CONFIRM FREIGHT RELEASE WITH PIER/CFS. PLEASE PICK-UP YOUR CARGO ASAP TO AVOID UNNECESSARY CHARGES.
  - THESE CHARGES ARE FOR THE ACCOUNT OF ULTIMATE CONSIGNEE TO WHOM THIS FREIGHT IS RELEASED.
  - G.O. DATE IS 15 DAYS FROM THE VESSEL ARRIVAL DATE

Invoice No : INV200325322-A Due date:3/1/2009		
DESCRIPTION OF CHARGES	PREPAID	COLLECT
HAZ MAT	0.00	550.00
PIERPASS	0.00	26.80
CLEAN TRUCK	0.00	26.80
HANDLING CHARGE	0.00	65.00
XRAY EXAM FEE	0.00	115.37
<b>TOTAL AMOUNT</b>	<b>0.00</b>	<b>783.97</b>

## \*\*\*\* MATERIAL SAFETY DATA SHEET \*\*\*\*

trichloroacetyl chloride, 97%

## \*\*\*\* SECTION 1 - CHEMICAL PRODUCT AND COMPANY IDENTIFICATION \*\*\*\*

Product Name: Trichloroacetyl chloride, 97%

Product Numbers:

29624-0000, 29624-2500

Synonyms:

Company Identification: Yancheng Jingwei International Group Co., Ltd.  
12 East Yanhe Road, Yancheng, Jiangsu, China

Phone: +86-515-88206080 Fax: +86-515-88238909

## \*\*\*\* SECTION 2 - COMPOSITION, INFORMATION ON INGREDIENTS \*\*\*\*

CAS#	Chemical Name	%	EINECS#	Haz Symbols
76-02-8	Trichloroacetyl chloride	97%	200-926-7	

Hazard Symbols: T+

Risk Phrases: 22 26 35

## \*\*\*\* SECTION 3 - HAZARDS IDENTIFICATION \*\*\*\*

## EMERGENCY OVERVIEW

Harmful if swallowed. Very toxic by inhalation. Causes severe burns. Mutagen. Moisture sensitive.

## Essential Health Effects

Eye:

Causes severe eye burns.

Skin:

Causes skin burns.

Ingestion:

Harmful if swallowed. Causes gastrointestinal tract burns.

Inhalation:

May be fatal if inhaled. May cause irritation of the respiratory tract with burning pain in the nose and throat, coughing, wheezing, shortness of breath and pulmonary edema. Inhalation may be fatal as a

result of spasm, inflammation, edema of the larynx and bronchi,  
chemical pneumonitis and pulmonary edema.

Chronic:

Not available.

\*\*\*\* SECTION 4 - FIRST AID MEASURES \*\*\*\*

Eyes:

Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting the upper and lower eyelids. Get medical aid immediately.

Skin:

Get medical aid immediately. Immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes.

Ingestion:

Do not induce vomiting. If victim is conscious and alert, give 2-4 cupfuls of milk or water. Get medical aid immediately.

Inhalation:

Get medical aid immediately. Remove from exposure and move to fresh air immediately. If not breathing, give artificial respiration. If breathing is difficult, give oxygen.

Notes to Physician:

\*\*\*\* SECTION 5 - FIRE FIGHTING MEASURES \*\*\*\*

General Information:

As in any fire, wear a self contained breathing apparatus in pressure-demand, MSHA/NIOSH (approved or equivalent), and full protective gear.

Extinguishing Media:

Do NOT use water directly on fire.

\*\*\*\* SECTION 6 - ACCIDENTAL RELEASE MEASURES \*\*\*\*

General Information: Use proper personal protective equipment as indicated in Section 8.

Spills/Leaks:

Absorb spill with inert material (e.g. vermiculite, sand or earth), then place in suitable container.

\*\*\*\* SECTION 7 - HANDLING and STORAGE \*\*\*\*

Handling:

Do not breathe dust, vapor, mist, or gas. Do not get in eyes, on skin, or on clothing. Use only in a chemical fume hood.

Storage:

Store in a cool, dry place. Store in a tightly closed container. Corrosives area.

\*\*\*\* SECTION 8 - EXPOSURE CONTROLS, PERSONAL PROTECTION \*\*\*\*

Engineering Controls:

Use adequate ventilation to keep airborne concentrations low.

Personal Protective Equipment

Eyes:

Wear appropriate protective eyeglasses or chemical safety goggles as described by OSHA's eye and face protection regulations in 29 CFR 1910.133 or European Standard EN166.

Skin:

Wear appropriate protective gloves to prevent skin exposure.

Clothing:

Wear appropriate protective clothing to prevent skin exposure.

Respirators:

Follow the OSHA respirator regulations found in 29 CFR 1910.134 or European Standard EN 149. Always use a NIOSH or European Standard EN 149 approved respirator when necessary.

\*\*\*\* SECTION 9 - PHYSICAL AND CHEMICAL PROPERTIES \*\*\*\*

Physical State:	Clear liquid
Color:	pale yellow
Odor:	Not available.
Density:	Not available.
Boiling Point:	1.33 hPa @ 51 deg C
Viscosity:	Not available.
Freezing Point:	114.0 - 116.0 deg C @ 760.00m
Freezing/Melting Point:	0 deg C
Flash Point:	Not available.
Ignition Temperature:	Not available.
Self-Heating Point:	Not available.
Decomposition Limits, lower:	Not available.
Decomposition Limits, upper:	Not available.
Stability:	Not available.
Composition Temperature:	

ubility in water: decomposes in water  
cific Gravity/Density: 1.6290g/cm3  
ecular Formula: CCl3COCl  
ecular Weight: 181.83

\*\*\*\* SECTION 10 - STABILITY AND REACTIVITY \*\*\*\*

Chemical Stability:

Stable under normal temperatures and pressures.

Conditions to Avoid:

Incompatible materials.

Incompatibilities with Other Materials:

Water, oxidizing agents, strong bases, alcohols.

Hazardous Decomposition Products:

Hydrogen chloride, phosgene, carbon monoxide, irritating and toxic fumes and gases, carbon dioxide.

Hazardous Polymerization: Has not been reported.

\*\*\*\* SECTION 11 - TOXICOLOGICAL INFORMATION \*\*\*\*

RTECS#:

CAS# 76-02-8: A07140000

LD50/LC50:

CAS# 76-02-8: Inhalation, mouse: LC50 = 445 mg/m3; Inhalation, rat:  
LC50 = 475 mg/m3/4H; Oral, rat: LD50 = 600 mg/kg.

Carcinogenicity:

Trichloroacetyl chloride -

Not listed by ACGIH, IARC, NIOSH, NTP, or OSHA.

See actual entry in RTECS for complete information.

\*\*\*\* SECTION 12 - ECOLOGICAL INFORMATION \*\*\*\*

\*\*\*\* SECTION 13 - DISPOSAL CONSIDERATIONS \*\*\*\*

pose of in a manner consistent with federal, state, and local regulations.

\*\*\*\* SECTION 14 - TRANSPORT INFORMATION \*\*\*\*

IATA

Shipping Name: TRICHLOROACETYL CHLORIDE

Hazard Class: 8

UN Number: 2442



Packing Group: II

TMO

Shipping Name: TRICHLOROACETYL CHLORIDE

Hazard Class: 8

UN Number: 2442

Packing Group: II

RID/ADR

Shipping Name: TRICHLOROACETYL CHLORIDE

Hazard Class: 8

UN Number: 2442

Packing group: II

\*\*\* SECTION 15 - REGULATORY INFORMATION \*\*\*

European/International Regulations

European Labeling in Accordance with EC Directives

Hazard Symbols: T+

Risk Phrases:

R 22 Harmful if swallowed.

R 26 Very toxic by inhalation.

R 35 Causes severe burns.

Safety Phrases:

S 28A After contact with skin, wash immediately with plenty of water.

S 36/37/39 Wear suitable protective clothing, gloves and eye/face protection.

S 38 In case of insufficient ventilation, wear suitable respiratory equipment.

S 45 In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).

WGK (Water Danger/Protection)

CAS# 76-02-8: 2

United Kingdom Occupational Exposure Limits

United Kingdom Maximum Exposure Limits

Canada

CAS# 76-02-8 is listed on Canada's DSL List.

CAS# 76-02-8 is listed on Canada's Ingredient Disclosure List.

Exposure Limits

FEDERAL

TSCA

CAS# 76-02-8 is listed on the TSCA inventory.

## \*\*\* SECTION 16 - ADDITIONAL INFORMATION \*\*\*

MSDS Creation Date: 7/16/1996 Revision #0 Date: Original.

The information above is believed to be accurate and represents the best information currently available to us. However, we make no warranty of merchantability or any other warranty, express or implied, with respect to such information, and we assume no liability resulting from its use. Users should make their own investigations to determine the suitability of the information for their particular purposes. In no way shall the company be liable for any claims, losses, or damages of any third party or for lost profits or any special, indirect, incidental, consequential or exemplary damages, howsoever arising, even if the company has been advised of the possibility of such damages.

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